

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAKEENA MARIE-LASHELLE TUCKER,

INDICTMENT

Defendant.

_____ /

The Grand Jury charges:

COUNTS 1-3
(Wire Fraud)

From on or about May 13, 2020 to on or about October 14, 2020, in Berrien County, in the Southern Division of the Western District of Michigan, and elsewhere,

SHAKEENA MARIE-LASHELLE TUCKER,

having knowingly devised a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations, caused signs, sounds, and signals to be transmitted by wire in interstate commerce for the purpose of executing the scheme.

The defendant electronically submitted an initial application and weekly claims for Unemployment Insurance (UI) benefits to the Michigan Unemployment Insurance Agency (UIA), and thereby caused UIA to deposit approximately \$8,931 into an account controlled by the defendant. The defendant falsely represented that

she had been laid off by her employer, when in fact she continued to work there. As a result, she received both regular pay and UI benefits at the same time.

For the purpose of executing the scheme and artifice, the defendant knowingly and intentionally transmitted, and caused to be transmitted, by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds:

COUNT	DATE	DESCRIPTION
1	May 13, 2020	Initial application for Michigan UI benefits, claim no. 0-019-679-726
2	May 18, 2020	First periodic deposit of Michigan UI benefits for claim no. 0-019-679-726, in amount \$4,720, to defendant's Fifth Third Bank account ending in 9710.
3	October 14, 2020	Last periodic deposit of Michigan UI benefits for claim no. 0-019-679-726, in amount \$304.20, to defendant's Fifth Third Bank account ending in 9710.

18 U.S.C. § 1343

COUNTS 4-10
(Wire Fraud)

Between on or about June 18, 2020 and on or about October 12, 2021, in Berrien County, in the Southern Division of the Western District of Michigan, and elsewhere,

SHAKEENA MARIE-LASHELLE TUCKER,

having knowingly devised a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations, caused signs, sounds, and signals to be transmitted by wire in interstate commerce for the purpose of executing the scheme.

The defendant electronically submitted applications for Economic Injury Disaster Loans (“EIDL”) and advances to the United States Small Business Administration (“SBA”) falsely certifying that she was the sole proprietor of a fictitious business named “Shakeena Tucker,” engaged in personal services, which had qualifying income and expenses in the twelve months prior to the COVID-19 disaster. As a result, the SBA made deposits totaling \$15,000 into an account controlled by the defendant.

For the purpose of executing the scheme and artifice, the defendant knowingly and intentionally transmitted, and caused to be transmitted, by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds:

COUNT	DATE	DESCRIPTION
4	June 18, 2020	Application for EIDL, claim no. 3305359202.
5	June 23, 2020	Deposit of EIDL advance for claim no. 3305359202, in amount \$1,000, to defendant's Fifth Third Bank account ending in 9710.
6	January 12, 2021	Application for EIDL, claim no. 3316371889.
7	June 2, 2021	Application for EIDL, claim no. 3320065242.
8	July 13, 2021	Deposit of EIDL loan disbursement for claim no. 3305359202, in amount \$9,000, to defendant's Fifth Third Bank account ending in 9710.
9	July 16, 2021	Telephone call to SBA customer service, providing new account for disbursements, Honor Credit Union account number ending in 8001.
10	July 20, 2021	Deposit of EIDL loan disbursement for claim no. 3305359202, in amount \$5,000, to defendant's Honor Credit Union account ending in 8001.

18 U.S.C. § 1343

COUNTS 11-13
(Wire Fraud)

Between on or about April 14, 2021 and on or about May 12, 2021, in Berrien County, in the Southern Division of the Western District of Michigan,

SHAKEENA MARIE-LASHELLE TUCKER,

having knowingly devised a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations, caused signs, sounds, and signals to be transmitted by wire in interstate commerce for the purpose of executing the scheme.

The defendant electronically submitted a Paycheck Protection Program (PPP) loan application and supporting documents for “Shakeena Tucker,” a fictitious sole proprietorship, which resulted in the transfer of \$20,832 in loan proceeds from Prestamos CDFI, LLC (“Prestamos”), a community development financial institution in Arizona, to an account controlled by the defendant in Michigan.

The defendant reported fictitious income and expenses to qualify for the loan, and certified that she would use the funds only for business-related purposes as authorized by PPP, when in fact, she spent the money on personal goods and services.

For the purpose of executing the scheme and artifice, the defendant knowingly and intentionally transmitted, and caused to be transmitted, by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds:

COUNT	DATE	DESCRIPTION
11	April 14, 2021	Borrower's application to SBA for PPP loan no. 7743718800.
12	April 14, 2021	Lender's application by Prestamos to SBA for PPP loan no. 7743718800.
13	May 12, 2021	Deposit of PPP loan disbursement from Prestamos for loan no. 7753718800, in amount \$20,832, to defendant's Fifth Third Bank account ending in 9710.

18 U.S.C. § 1343

COUNT 14
(False Bankruptcy Declaration)

On or about May 12, 2021, in Berrien County, in the Southern Division of the Western District of Michigan,

SHAKEENA MARIE-LASHELLE TUCKER

knowingly and fraudulently made a false declaration, certificate and verification under penalty of perjury, as permitted under Section 1746 of Title 28, and in relation to a case under Title 11, *In re: Shakeena Marie-Lashelle Tucker*, Case No. 1:21-bk-01257, by submitting a Summary of Assets and Liabilities and a Statement of Financial Affairs, in which the defendant fraudulently represented that she had not owned a business, been a sole proprietor, or been self-employed in the last 4 years; and not used any business name or Employee Identification Numbers (EIN) in the last 8 years, when in fact she knew she had used the name of a fictitious sole proprietorship and an EIN to apply for a fraudulent Paycheck Protection Program loan in April of the same year.

18 U.S.C. § 152(3)

COUNT 15
(False Statements Under Oath in Bankruptcy Proceeding)

On or about June 15, 2021, in Berrien County and Kent County, in the Southern Division of the Western District of Michigan,

SHAKEENA MARIE-LASHELLE TUCKER

knowingly and fraudulently made a false material statement under oath in and in relation to a case under Title 11, *In re: Shakeena Marie-Lashelle Tucker*, Case No. 1:21-bk-01257, by falsely testifying under oath in a proceeding before the case trustee, at a meeting of creditors, that she had not applied for, or received money from the Paycheck Protection Program, when in fact the defendant knew that she had.

18 U.S.C. § 152(2)

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

MARK A. TOTTON
United States Attorney



NILS R. KESSLER
Assistant United States Attorney